

## **Comments on RM-11828**

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Some of the changes proposed by RM-11828 may help grow the amateur radio community; others are potentially disastrous.

I support the addition of limited digital mode privileges for Technician licensees. However, I reject the notion that the limited amount of digital-mode material in the current Technician syllabus is in any way sufficient to cover those privileges. Because a single operator overdriving a transmitter with, say, an FT8 signal can blanket a digital sub-band with interference, I would ask that the FCC mandate an NCVEC revision of the Technician question pool to add more comprehensive content on digital-mode theory and operating practices.

Whether the addition of these HF digital privileges will in any way help attract and retain new amateur radio operators, I cannot say, but I believe that granting them is unlikely to be harmful to the service.

I am opposed to the granting of HF phone privileges to Technician licensees; doing so is problematic at best. Not only does it blunt the incentive to obtain a General class license, but it also is likely to add a large number of inexperienced operators to phone segments that the FCC lacks the resources to police, a fact evident to anyone who tunes across the 75-meter phone band on a typical evening. Of all amateur radio modes, phone modes are the ones most given to abuse. They are (relatively) easy to operate, and, because they can be heard by anyone who can tune a shortwave radio receiver, they offer the broadest possible audience to miscreants.

Sadly, RM-11828 is an attempt at an easy fix for a problem whose resolution requires far more effort. A more meaningful approach to improving amateur radio growth and retention involves at least two things:

- 1) A bona fide entry-level license, and not the one-size-fits-few mish-mash that is the current Technician license.
- 2) A meaningful and well-run mentoring effort on the part of the amateur radio community.

Item (1) requires an additional license class, something the FCC seems unwilling to consider, while item (2) would require an ambitious, multi-year effort on the part of organizations like the ARRL and a legion of volunteers. Nevertheless, both items are necessary components to attracting and retaining new amateur radio operators.

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